

August 29, 2022

Regional Colleagues,

This message is to provide you with an update on the pest management plans for the office. Given the necessary cleanup effort, the below procedures have been put in place to safeguard and secure Confidential Business Information (CBI), Personally Identifiable Information (PII)/Sensitive Personally Identifiable Information (SPII), and/or Privacy Act information prior to having a pest control contractor in our workspace. For the purposes of these instructions, CBI includes information in which an affected business has asserted a business confidentiality claim covering the information, or a business could be expected to make such a claim if it were aware that disclosure of the information was proposed. After all CBI, PII/SPII/Privacy Act information has been secured, the contractor will then inspect individual workspaces for evidence of rodent contamination, box up unsecured non-contaminated documents and materials found on floors and desktops of individual workspaces, bag unsecured contaminated documents and materials for later decontamination (including contaminated material in drawers, cabinets, and bookshelves), address any evidence of rodent activity, and clean all floors and countertops. In addition, the contractor will remove and dispose of food sources from all office areas (including all cubicles and offices, storage rooms, and break rooms) and will address any rodent activity found in common spaces. We plan to have this pre-pest remediation initiative completed **by September 13, 2022**, with this effort starting on **Tuesday, August 30, 2022**.

**Before the pest control contractor enters the EPA workspace, it is imperative that we properly safeguard all CBI/PII/SPII and Privacy Act information so that it cannot be accessed by the contractor.** (EPA's Privacy Policy can be found [here](#). See page 10 for definitions of PII, SPII, and Privacy Act information.)

**PLEASE DO NOT HANDLE CONTAMINATED DOCUMENTS.** Contaminated CBI, PII/SPII/Privacy Act documents will be bagged by trained EPA employees before the contractor begins its activities (see below "Instructions for Contaminated Documents").

**STEP 1 – Notification to Manager:**

**If you do not have CBI or PII/SPII/Privacy Act information in your workspace**, please send an email to your manager **by September 6, 2022**, which states one of the following:

- i. I confirm that I have no CBI or PII/SPII or Privacy Act information about me or other persons in my workspace, or
- ii. I confirm that I have no CBI in my workspace, but may have PII/SPII or Privacy Act information about me or other persons in my workspace, or
- iii. I confirm that I have no PII/SPII or Privacy Act information about me or other persons in my workspace but may have CBI in my workspace.

## **STEP 2 – Handling of Non-Contaminated Documents:**

### **A. Instructions for Non-Contaminated CBI**

All CBI in your workspace must be secured **by September 13, 2022**. To secure CBI, please provide the CBI to your document control officer, OR, if that is not possible, place the CBI in a **LOCKED** drawer/cabinet in your office **AND** tape a sign on the drawer/cabinet that says “CBI - DO NOT OPEN”. Alternatively, your division may direct you to store your CBI in a common secured area, such as a CBI room. Before the pest control contractor enters your workspace, an EPA management official will open the locked drawer with a master key to confirm that there is no rodent activity. (Please see below instructions regarding in-office safety steps, drawer/cabinet storage inspection, and actions in the event of identified rodent activity.) Reminder: In the event that you observe rodent activity located on or near CBI, please do not handle the potentially contaminated documents (see Instructions for Contaminated Documents below). **All drawers in your workspace with non-contaminated CBI should be locked.**

### **B. Instructions for Non-Contaminated PII/SPII/Privacy Act Information About Other**

**Persons:** All PII/SPII/Privacy Act information in your workspace that identifies or pertains to other persons (such as privacy information submitted in response to a regulatory information request, or for managers, PII/SPII/Privacy Act information of staff) must be secured by **September 13, 2022**. To secure PII/SPII/Privacy Act information about other persons, consolidate all the documents into one **LOCKED** drawer/cabinet in your office **AND** tape a sign on the drawer/cabinet that says, “PRIVACY INFORMATION – DO NOT OPEN”. Alternatively, your division may direct you to store these documents in a common secured area. Before the pest control contractor enters your workspace, an EPA management official will open the locked drawer/cabinet with a master key to confirm that there is no rodent activity. (Please see below instructions regarding in-office safety steps, drawer/cabinet storage inspection, and instructions in the event of identified rodent activity.) Reminder: In the event that you observe rodent activity located on or near PII/SPII/Privacy Act Information, please do not handle the potentially contaminated documents (see Instructions for Contaminated Documents below). **All drawers in your workspace with non-contaminated PII/SPII/Privacy Act Information about others should be kept locked.**

**C. Instructions for PII/SPII/PRIVACY Act Information About You:** With regard to your own PII/SPII/Privacy Act Information, the Region is offering two options:

**Option 1 (Sign a Waiver- See Attached):** The pest-control contractor will be instructed not to read, use, or disclose any information that they have incidental access to while in our offices. Additionally, the contractor will be required to sign a non-disclosure agreement. If, based on these protections, you consent to the contractor opening drawers and cabinets in your workspace that may contain your own personal PII/SPII/Privacy Act information, please sign the attached PII/SPII/Privacy Act Waiver, and return it to your manager **no later than September 13, 2022**.

**Option 2 (Remove Your Information):** If you do not wish to sign a waiver, then by **no later than September 13, 2022**, you may access your workspace to collect your personal information and bring it home. Once you have removed your personal PII/SPII/Privacy Act Information, please send an email to your manager which says, "I confirm that I have removed all of my personal PII/SPII and Privacy Act information from my workspace." (Please see below instructions regarding in-office safety steps and actions in the event of identified rodent activity.)

*Note: If you have a health condition that precludes you from coming to the building to address CBI and/or the PII/SPII/Privacy Act Information of others, or your office/workspace contains only your own PII/SPII/Privacy Act Information and you do not wish to sign a waiver, please contact your manager. Additional instructions will be provided. It is critical that you be able to identify the exact location of any CBI/PII/SPII/Privacy Act information in your workspace so it can be located and secured by EPA management.*

#### **INSTRUCTIONS FOR CONTAMINATED DOCUMENTS:**

- In the event that you observe rodent activity located on or near CBI, PII/SPII/Privacy Act information, please do not handle the contaminated documents.
- If contaminated CBI or PII/SPII/Privacy Act documents are in a drawer or cabinet, tape a sign to the drawer or cabinet labeled "CONTAMINATED: EPA ACCESS ONLY." **Do not lock the drawer or cabinet containing contaminated documents.**
- If contaminated CBI or PII/SPII/Privacy Act documents are on a worksurface or floor, place the sign near the documents.
- The pest control contractor will not have access to workspaces identified as containing contaminated CBI or PII/SPII/Privacy Act documents. Upon identification of contaminated CBI or PII/SPII/Privacy Act documents, please contact your manager who will then make arrangements for a qualified EPA response employee who has taken agency privacy training, to remove the contaminated CBI or PII/SPII/Privacy Act documents and place them in a bio-hazard bag. If you wish, you may be present when that activity takes place. The bagged documents will be stored in a secure location in ORC.

#### **IN-OFFICE SAFETY STEPS:**

- Please let your manager know when you plan to be in the office so that your name can be included on your divisional on-site list.
- You are asked to wear a mask, gloves, and booties while in your workspace. Masks, gloves, and booties will be available at the lobby bank of elevators on each floor. Please wear those before entering your floor and dispose of them, in the trash can provided, before exiting the elevator banks on each floor. Should there be none available, you can also pick them up in the mailroom, from 8:00 a.m. until 5:00 p.m.
- Please only access your workspace for the limited time necessary to address all CBI/PII/SPII/Privacy Act information.

**STORAGE OF CBI or PII/SPII/PRIVACY ACT INFORMATION:**

- Do not store CBI, PII/SPII/Privacy Act information in a drawer/cabinet if you see any indication of rodent activity or if you suspect that there may be rodent activity.
- Do not reach into any drawer or cabinet unless you have first confirmed that there is no rodent activity.